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23 UNITED STATES DISTRICT COURT
24 FOR THE NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 AMERICAN FEDERATION OF
27 GOVERNMENT EMPLOYEES, AFL-CIO, et
28 al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF MARY-JEAN
BURKE**

DECLARATION OF MARY-JEAN BURKE

I, Mary-Jean Burke, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief. I am providing this declaration as a union officer.

2. I am a physical therapist at Richard L. Roudebush VA Medical Center in Indianapolis, Indiana. I was hired to provide in-patient physical therapy in an acute care setting. I have worked for the Department of Veterans Affairs ("VA") for 29 years.

3. I have been the First Executive Vice President for the National Veterans Affairs Council (NVAC) of the American Federation of Government Employees ("AFGE" or "Union") since 2007.

4. NVAC represents nationwide bargaining units of approximately 300,000 professional and non-professional employees who work at nearly every VA administration and component, including the Veterans Health Administration, Veterans Benefits Administration, National Cemetery Administration, and operational components such as, but not limited to, the Office of Information & Technology, Office of Finance, Office of Emergency Management, and the VA History Office. The largest number of AFGE-represented workers are employed at urban hospitals and rural clinics under the Veterans Health Administration; these employees include physicians, dentists, pharmacists, physical and occupational therapists, housekeepers, engineers, custodians, cooks, and numerous other healthcare and support staff. Represented workers in other VA administrations and components include cemetery workers, gardeners, archivists, security officers, claim processors, clerical workers, firefighters, IT professionals, bookkeepers, and numerous other civil servants.

5. NVAC's mission is to support and advocate for the federal employees who take care of our nation's veterans, including working for a safe and fair workplace for all members. Nearly 40 percent of NVAC's members are themselves veterans. As the exclusive bargaining representative of these workers, NVAC provides many services to all bargaining unit employees. Core functions of the Union include working in a mutually respectful partnership with the VA to

1 secure a fair and reasonable master collective bargaining agreement (“MCBA”); negotiating
2 implementation of new policies during the term of the MCBA; filing and prosecuting grievances
3 (locally and nationally) against the agency to enforce the terms and conditions of the MCBA;
4 representing workers in arbitration and before professional standards boards; participating in
5 safety inspections and negotiating safety abatements; and providing guidance and support to
6 members navigating USERRA, EEO, and other federal processes.

7 6. The Union first became aware of President Trump’s plan to conduct “large-scale”
8 RIFs through the Feb. 11, 2025 Executive Order. No one from the VA had said anything about
9 large-scale RIFs to the union prior to that Order.

10 7. On March 4, 2025, the Chief of Staff of the VA sent a memorandum to under
11 secretaries, assistant secretaries, and other officials titled “Department of Veterans Affairs Agency
12 Reduction in Force (RIF) and Reorganization Plan (ARRP)” (“ARRP Memorandum”). A true and
13 correct copy of the AARP Memorandum is attached hereto as Exhibit A.

14 8. The ARRP Memorandum states that it “initiates the Department of Veterans
15 Affairs (VA) Departmentwide review of mission, organization, and structure in order to achieve
16 efficiencies dictated by President Trump's February 11, 2025, Executive Order Implementing the
17 President’s “Department of Government Efficiency” (DOGE) Workforce Optimization Initiative
18 (Workforce Optimization) and the subsequent February 26, 2025, Office of Personnel
19 Management (OPM) and Office of Management and Budget (OMB) guidance document on RIF
20 and Reorganization Plans.” According to the ARRP Memorandum, the VA plans “to affect a VA-
21 wide RIF in August to resize and tailor the workforce to the mission and revised structure,” while
22 acting “in partnership with our DOGE leads.”

23 9. According to the ARRP Memorandum, “the Department’s initial objective is to
24 return to our 2019 end-strength numbers of 399,957 employees.” This represents a reduction of
25 roughly 80,000 VA employees.

26 10. The ARRP memorandum set out an implementation timeline in which information
27 gathering would be completed between February 28 and March 10, 2025—six days after the
28 memo was sent—including but not limited to “Organization Charts and Structures for all

1 organizations down to lowest level,” a “[l]ist of statutorily mandated functions / entities” with
2 “certification that these have been interpreted to cover only what functions they explicitly
3 require,” a “[l]ist of regulatory directed functions,” a list of “[e]ssential positions that excluded
4 from potential reduction/RIF” (sic) and “NOT mandated as essential during a lapse in
5 appropriations (using the Agency Contingency Plans submitted to OMB in 2019),” and
6 “[i]dentification of all systems utilized by the Department for its mission to include costs, contract,
7 and associated personnel.” Following that information gathering process, the Administrations and
8 Staff Offices would provide “required products” by “April 10, 2025, to provide responses to OMB
9 and OPM Phase 2 requirements by April 14, 2025.”

10 11. The announcement of the ARRP has caused significant fear and concern among
11 NVAC’s bargaining units, their members, and leadership. Employees have no way of knowing
12 whether their positions are among the 80,000—more than 15% of the entire VA—slated to be
13 eliminated. In the wake of this uncertainty, the VA released a bulletin on April 4 on “provid[ing]
14 guidance regarding an opportunity for Department of Veterans Affairs (VA) employees to resign
15 or retire as part of VA’s deferred resignation/retirement program (DRP) prior to reductions in
16 force later this fiscal year.” A true and correct copy of the Bulletin is attached hereto as Exhibit B.
17 Under the DRP procedures, the VA allowed employees to opt-in to the deferred
18 resignation/retirement program between April 7 and April 30, 2025 and resign or retire by
19 September 30, 2025. As part of the agreement, in exchange, these employees would “not be
20 subject to a reduction in force.”

21 12. NVAC and its local bargaining units have not been provided with any further
22 information about the planned RIFs, or with the additional information and Phase 2 documents the
23 VA planned to provide to OMB and OPM by April 14, 2025.

24 13. Although the VA has not made public or informed the union of the content of the
25 Phase 2 ARRP or yet sent notices of any RIF, public press reports from early April have included
26 a list of targeted positions and a timeline for implementation. Attached hereto as Exhibit C is a
27 true and correct copy of a news article from KTNV Las Vegas published April 9, entitled “As
28

1 concerns among veterans rise, VA source shares details of workforce reduction plan.” According
2 to the plan shared with the press (Reorganization Plan), the RIFs will affect:

3 Administrative and Support Roles:

- 4 • Policy and program analysts
- 5 • HR personnel
- 6 • IT support staff in non-critical functions
- 7 • Clerical and data entry positions

8 Medical and Healthcare Support Staff:

- 9 • Non-patient-facing administrative healthcare roles
- 10 • Some contract positions in VA medical centers
- 11 • Certain research positions with reduced funding

12 Regional and Central Office Staff:

- 13 • Veterans Affairs Central Office (VACO) will see cuts in operational, administrative,
14 and policy roles
- 15 • Reductions in public affairs, strategic planning, and some procurement functions

16 Field Office and Call Center Reductions:

- 17 • VA call centers are expected to be streamlined with automation, reducing the need for
18 live agents
- 19 • Some regional field office roles will be merged or reassigned.

20 According to the Reorganization Plan, RIF notices will be sent to employees starting in June, and
21 the terminations will begin in July and continue in three waves through December 2025. A
22 spokesman for the VA called the Reorganization Plan a “fraudulent and intentionally false leaked
23 document.” Exhibit C.

24 14. Further reporting in Government Executive on April 24, 2025, a true and correct
25 copy of which is attached hereto as Exhibit D, updated the timeline and stated that according to
26 VA sources, “VA will review the suggestions from individual components in May and release its
27 reorganization plan in June. RIFs will take place by September.”

1 15. Regardless of whether the specific cuts match those set forth in the Reorganization
2 Plan, reducing the VA to 2019 staffing levels as set forth in the ARRP Memorandum will cause
3 substantial harm to tens of thousands of NVAC bargaining unit members—many themselves
4 veterans—who will lose their jobs and benefits, including health insurance.

5 16. Cutting 80,000 VA employees will cause immediate chaos across every aspect of
6 VA, including providing health care, helping veterans access other benefits, and processing
7 claims. Under the Reorganization Plan, healthcare providers are not directly subject to the cuts,
8 but support staff crucial to that work will face larger cuts to achieve a roughly 15% reduction in
9 staff Department-wide. Enacting any version of a plan that terminates 80,000 VA employees will
10 result in damage to, delays in, and denials of the services the VA is tasked with providing to our
11 nation's veterans.

12 17. Non-patient facing staff at the VA are a critical part of the Department, and their
13 terminations will cause substantial harm. For example, staff in procurement manage an entire
14 system to acquire and warehouse medical devices, supplies, mobility aids, and other equipment,
15 and those staff coordinate shipment of that equipment to healthcare providers for the veterans they
16 serve. Cuts to procurement functions at regional staff, as described in the Reorganization Plan,
17 will make it much more difficult to quickly access the necessary equipment. When the VA
18 terminated probationary employees in February 2025, the termination of multiple staff at one
19 warehouse meant I experienced significant delays in getting a Transcutaneous Electrical Nerve
20 Stimulation (TENS) unit, which provides drug-free pain relief, to the medical center where I work
21 in Indianapolis. The probationary employee terminations affected under 2,000 employees across
22 the VA. The termination of significantly more employees will create broader system-wide
23 disruptions to accessing equipment at VA medical centers across the country.

24 18. Other VA staff subject to RIFs under the Reorganization Plan ensure that veterans
25 can make appointments and receive care at all. Administrative staff ensure that the right patient
26 information is recorded into the proper systems; call center employees take calls that range from
27 booking appointments to responding to veterans in crisis; custodial staff ensure that rooms are
28 clean and available for patients; engineers install and maintain fire suppression systems for clinics;

1 among so many crucial positions. Without these employees, Medical Centers and other VA
2 programs cannot run safely and efficiently or provide care for as many patients.

3 19. As an example, I am aware of one Vet Center that had its receptionist terminated
4 with no notice during the earlier termination of probationary employees. Vet Centers are
5 community-based counseling centers that provide a wide range of social and psychological
6 services, including walk-in services for veterans in need of mental health support. Veterans who
7 needed to access the center—including any who might be in crisis or in need of immediate care—
8 were forced to knock on the door and hope that the counselors were not currently with other
9 patients or that someone would be available to hear and let them in. The much greater cuts
10 planned in the ARRP Memorandum will cause these sorts of problems at a greater scale
11 throughout the system.

12 20. The terminations set out in the Reorganization Plan also include cuts to certain
13 research positions. Thousands of studies are conducted at VA medical centers, clinics, and
14 nursing homes each year into mental health, disease, and more. For example, the Million Veteran
15 Program has collected data on over a million veterans since 2011 to analyze how genes, lifestyle,
16 military experiences, and exposures affect health and wellness in veterans. Cuts to research
17 positions at the level needed to reduce VA staff by 80,000 employees will hamstring important
18 research projects and cause the loss of data and discoveries that would have resulted from
19 finishing that work.

20 21. These harms to VA services will directly impact NVAC's members who are also
21 veterans, whether or not they are subject to terminations. The terminations will also harm NVAC
22 members who are not subject to the RIF, but who are required to maintain their own workloads
23 while taking on additional necessary tasks previously performed by terminated employees.

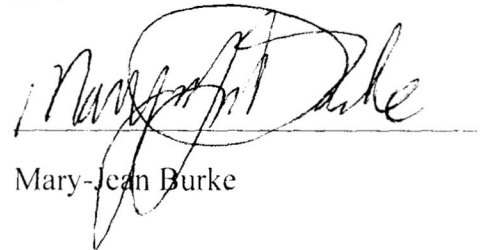
24 22. The planned reorganization and RIFs directly threaten the NVAC's ability to
25 provide core services to unit members and to accomplish its mission. NVAC will be forced to
26 devote substantial resources to assisting local unions bargaining unit members and providing
27 guidance about responding to the RIFs. Many members, already fearing that their terminations are
28 imminent under the plans released in the ARRP Memorandum and Reorganization Plan,

1 understandably have asked questions—by email, in person, and by phone—about the impact of
2 these actions on their rights. Addressing this overwhelming demand has diverted critical resources
3 from other union priorities.

4 23. NVAC's staff and activities are funded through members' voluntary dues, most of
5 which are paid through payroll deduction from their pay. If NVAC no longer receives dues from
6 the tens of thousands of members who are being laid off, that will make it significantly more
7 difficult for the Union to continue to function and to provide the services and protection to the
8 bargaining units it represents.

9 I declare under penalty of perjury under the laws of the United States that the foregoing is
10 true and correct. Executed April 28, 2025, in Washington, D.C.

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Mary-Jean Burke

Exhibit A

**Department of
Veterans Affairs**

Memorandum

D'B March 4, 2025

From: chief of Staff (00A)

sjO Department of Veterans Affairs Agency Reduction in Force (RIF) and Reorganization Plan (ARRP) (VIEWS 12864784)

to: Under Secretaries, Assistant Secretaries, and Other Key Officials

1. This memorandum initiates the Department of Veterans Affairs (VA) Department-wide review of mission, organization, and structure in order to achieve efficiencies dictated by President Trump's February 11, 2025, Executive Order Implementing the President's "Department of Government Efficiency" (DOGE) Workforce Optimization Initiative (Workforce Optimization) and the subsequent February 26, 2025, Office of Personnel Management (OPM) and Office of Management and Budget (OMB) guidance document on RIF and Reorganization Plans. VA, in partnership with our DOGE leads, will move out aggressively, while taking a pragmatic and disciplined approach to identify and eliminate waste, reduce management and bureaucracy, reduce footprint, and increase workforce efficiency. Additionally, a portion of the savings garnered will be reinvested in the Veterans we serve and the systems required to support our workforce and execute our mission. Following a thorough review of mission and structure, the Department will affect a VA-wide RIF in August to resize and tailor the workforce to the mission and revised structure.

2. This effort will require the entirety of VA staff and organizations to work together in a collaborative fashion, as well as to coordinate actions with DOGE and the Administration as a whole, to achieve the desired results within the allotted time. For planning purposes, the Department's initial objective is to return to our 2019 end-strength numbers of 399,957 employees. Furthermore, VA Administrations and Staff Offices will need to detail sufficient personnel to support this effort as outlined in this memorandum to focus on implementation and to synergize VA efforts.

3. Implementation Timeline.

a. Information Gathering (due March 10, 2025): Administrations and Staff Offices will gather required information as outlined in Attachment 1. Additionally, a separate memorandum on RIF procedures will be released, which will include required information and actions.

b. Line of Effort (LOE) 1: Administrations and Staff Offices will conduct an internal review and analysis of their organizations with required products to be delivered by April 10, 2025, to provide responses to OMB and OPM Phase 2 requirements by April 14, 2025.

Page 2.

Subj: Department of Veterans Affairs Agency Reduction in Force and Reorganization Plan (ARRP) (VIEWS 12864784)

c. LOE 2 (Intra-Department): A Department-wide review will be completed by May 9, 2025.

d. VA will publish its Reorganization Plan in June 2025 with a subsequent Department-wide RIF prior to the end of fiscal year 2025, as required by OMB and OPM.

e. Throughout all phases of the operation, there will be ongoing reviews and interim briefings and decision points. Additional implementation guidance is forthcoming.

4. Program Implementation.

a. VA Reorganization Implementation Cell (VA RIC): The Office of Human Resources and Administration/Operations, Security, and Preparedness (HRA/OSP) will stand-up the VA RIC to serve as the program manager and focus on implementation actions. The VA RIC will expand to execute necessary functions for the reorganization. The following Administrations and Staff Offices are required to detail a minimum of one individual at a grade level of General Schedule-14 or higher to support the VA RIC activities and serve as the liaison to their organization: Veterans Health Administration, Veterans Benefits Administration, National Cemetery Administration, HRA/OSP, Office of Information Technology, Office of Acquisition, Logistics, and Construction, Office of Enterprise Integration, Office of General Counsel, Office of Management, and Board of Veterans' Appeals. Name(s) should be submitted to VACO006FrontOfficeActions@va.gov by March 5, 2025. The start date will commence on March 6, 2025 (location will be provided by March 5). Initial details will be for a period of 120 days. In addition, VA liaisons to DOGE will be integrated into VA RIC operations ensuring positive and continuous communications with the Administration through all phases of the operation.

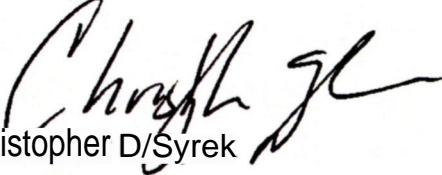
b. Administrations and Staff Offices will designate a senior leader (Senior Executive Service level) to serve as a central point of contact for time sensitive issues, or where senior-level contact is needed to resolve issues. Name(s) should be submitted to VACO006FrontOfficeActions@va.gov by March 5, 2025.

c. Under Secretaries, Assistant Secretaries, and other Key Officials will serve on the Executive Review Group (ERG). Membership will also include Senior Advisors and VA DOGE liaisons. The ERG will address issues and make recommendations to the Secretary for decision. The Secretary or his designee will chair the ERG.

Page 3.

Subj: Department of Veterans Affairs Agency Reduction in Force and Reorganization Plan (ARRP) (VIEWS 12864784)

5. The Secretary will chair an initial senior level meeting on March 5, 2025. Invitation is forthcoming.


Christopher D/Syrek

Attachment

Attachment

**Initial Data Call - Information/Data Gathering
(February 28 – March 10)**

- Provision of Organization Charts and Structures for all organizations down to lowest level.
- Provision of unit manpower documents by organization.
- List of statutorily mandated functions / entities – certification that these have been interpreted to cover only what functions they explicitly require.
- List of regulatory directed functions.
- List of organizations and total number of positions:
 - That provide direct service to Veterans;
 - **That support operations; and**
 - **Those that are management overhead.**
- List of positions:
 - Essential positions that excluded from potential reduction / RIF; and
 - **NOT mandated as essential during a lapse in appropriations (using the Agency Contingency Plans submitted to OMB in 2019).**
- Installations: List of installations across the Department with assigned personnel and capacity (excess).
- Technology/Systems: Identification of all systems utilized by the Department for its mission to include costs, contract, and associated personnel.
- Initial input of any identified organization, unit, or mission should be eliminated or consolidated; and which specific subcomponents or functions, if any, should be expanded to deliver on the President's priorities.
- The suggested plan for Congressional engagement to gather input and agreement on major restructuring efforts and the movement of fundings between accounts, as applicable, including compliance with any Congressional notification requirements.

Additional implementation guidance is forthcoming.

Exhibit B

VA



U.S. Department of Veterans Affairs

Office of the Chief Human Capital Officer

VA Central Office
Washington, DC

April 4, 2025

OFFICE OF THE CHIEF HUMAN CAPITAL OFFICER (OCHCO) BULLETIN

SUBJECT: Department of Veterans Affairs (VA) Deferred Resignation/Retirement Program (DRP)

1. PURPOSE: This OCHCO Bulletin provides guidance regarding an opportunity for Department of Veterans Affairs (VA) employees to resign or retire as part of VA's deferred resignation/retirement program (DRP) prior to reductions in force later this fiscal year.

2. PROCEDURES: VA is providing employees an opportunity to resign or retire under VA DRP no later than September 30, 2025. In exchange for immediate or deferred resignation or retirement, the employee will not be required to comply with return to in-person work policies, will not be subject to a reduction in force, and may be approved for a period of administrative leave prior to the effective date of their resignation or retirement. The employee and the management official approving the resignation or retirement under workforce restructuring will sign an agreement that will be placed in the employee's eOPF for recordkeeping.

The period to opt-in is from April 7 to April 30, 2025. Previous requests to participate in the Office of Personnel Management's (OPM) DRP will not suffice as evidence of opting in to this opportunity. Instead, new requests to participate in VA's DRP must be submitted and will be reviewed by the HR servicing office and supervisor. No requests to participate received after 5:00p.m. ET on April 30, 2025, will be considered.

Re-employed annuitants are not eligible to resign/retire under these procedures. Part-time employees are not eligible to resign/retire under these procedures. Probationary employees are eligible for VA DRP.

An employee approved for VA DRP must resign or retire by September 30, 2025, and if retiring under Voluntary Early Retirement Authority (VERA) must meet eligibility requirements on or before September 30, 2025. An employee approved for VA DRP may not be placed on administrative leave prior to the VA DRP agreement being signed and the expiration of the revocation period for employees 40 years and older (as applicable). The only exception is for employees already on administrative leave when requesting DRP.

OPM has granted the VA VERA in conjunction with DRP. Eligible employees may retire under VERA. Those serving under an appointment that is time limited, such as Title 38 Senior Executive Service Equivalents appointed under 38 U.S.C. § 7306, are not eligible for VERA. To be eligible for VERA, an employee must be at least age 50 with at least 20 years creditable Federal service or any age with at least 25 years creditable service, have been continuously employed by the agency for at least 31 days before the date that the agency initially requested OPM approval of VERA (April 1, 2025), hold a position that is not a time-limited appointment, and have not received a final removal decision based upon misconduct or unacceptable performance.

3. REQUIRED ACTIONS: Servicing Human Resources (HR) offices, management officials, and any individual accepting the offer to resign/retire through VA DRP must fully comply with all guidance in this Bulletin:

- a. Employees requesting to resign/retire through VA DRP must submit the request utilizing the Power App located at [Deferred Resignation Portal](#) no later than 5:00p.m. ET on April 30, 2025, or if an employee does not have access to the Deferred Resignation Portal, they must advise their supervisor of the request to resign/retire through VA DRP in writing. For employees who do not have access to the Deferred Resignation Portal, supervisors must promptly submit any requests to resign/retire in the Portal on the employee's behalf. Submitting an application/request does not immediately grant approval to participate or approval of administrative leave.
- b. The servicing HR office will contact the employee and acknowledge receipt of the VA DRP resignation/retirement request. The servicing HR office will confirm with management that the employee is eligible to resign/retire through VA DRP.
- c. Attachment A lists the occupational series and position titles that may be exempted from the VA DRP.
- d. Eligibility / DRP Approval.
 - 1) Employees in positions that are not listed in Attachment A are eligible for VA DRP and are approved at the management level (First-level SES).
 - 2) Employees in positions that are listed in Attachment A that do not provide direct care or do not support the direct care of Veterans are eligible for VA DRP and may be approved at the management level (First-level SES). Approval authority may be retained above the management level.
 - 3) Employees in positions that are listed in Attachment A that provide direct care, or that support the direct care of Veterans are ineligible for VA DRP, unless approved for an exception at the VACO level.
- e. VA DRP Process / Criteria.

1) Approval process will flow through management officials to the designated approving official if they are not one and the same. Management and Approving Officials may disapprove all requests for DRP.

2) Management and Approving Officials should consider the criticality of the position, impact on the continuity of the mission, recent staff departures and current staffing ratios, and the receipt of any special pay or incentives among other considerations in approving, disapproving or recommending the approval of VA DRP.

f. The VA DRP Agreement includes the following language in paragraph 2 regarding return of equipment and property such as PIV card, "Employee agrees to turn in all VA equipment and property on or before the latter of [DATE SHOULD NOT BE SOONER THAN July 1], 2025, or seven days after signing this agreement if Employee is age 40 or over, as directed by Employee's supervisor." When stipulating the date, the employee and supervisor should ensure there is sufficient time for the employee to complete performance appraisals prior to separation, access employee records such as MyPay, eOPF, VATAS, FEHB, FEGLI, TSP, complete retirement paperwork (e.g., GRB), and to complete financial disclosure and reporting information before separation from VA and loss of access to systems and information.

g. Agreements must be signed by the employee and an agency management official, returned to the servicing HR office, and retained in the employee's personnel record.

h. The signed agreement (signed by the employee and their management official) will document the agreed upon date the employee will begin administrative leave, which should be no sooner than July 1, 2025, or seven days after signing this agreement if employee is age 40 or over, whichever is later, and their date of separation via retirement or resignation. The employee's timekeeper will ensure their leave is coded in VAs Time and Attendance System (VATAS).

i. The servicing HR office is responsible for processing the notification of personnel action in VA's HR system of records and working with the employee and the employee's supervisor to complete all customary offboarding actions to properly separate the employee from federal service after the employee's resignation or retirement date. VA will follow all applicable obligations related to resignations and retirements from Federal service.

j. HR offices shall upload Agreements into the employee's eOPF using the Form Type Personnel Action/Support Doc and Form Description Resignation Document (Other than SF52) and using the date of the management official's signature as the effective date.

k. Employees must set an out-of-office message in Outlook upon commencement of their administrative leave. Consider a message along the lines of "Thank you for your message. I am on extended leave and unavailable to respond to your message. Please contact (XXX) for further assistance."

l. For separating employees who hold security clearances, de-briefing must occur prior to departure via the VACO Special Security Office within the Office of Security and Preparedness (OSP).

m. An indicator has been developed to include on the employee record for individuals who have elected VA DRP. The indicator will ensure all employees in the Program are being tracked in VA's HR system, HR Smart, and that standard forms are processed timely to affect the employee's resignation/retirement.

4. NEXT STEPS: HR Officers must share this information with their staff and first line supervisors and managers.

Attachment A

VETERANS HEALTH ADMINISTRATION

Series	Occupation
0060	Chaplain
0080	Security Administration (Police Chief, Physical Security Specialist, Personnel Security, Compliance Officer in 0080)
0081	Fire Protection and Prevention (Fire Fighter)
0083	Police
0101	Addiction Therapist
0101	Rehabilitation Counselor
0101	Social Science Specialist (Crisis Responder)
0101	Supervisory Social Science Specialist (Veterans Crisis Line and Crisis Responder)
0102	Peer Support Apprentice/Peer Specialist
0180	Psychology
0182	Marriage and Family Therapist
0183	Licensed Professional Mental Health Counselor
0185	Social Work
0301	Correspondence Analyst (Triage - Veterans Crisis Line and IVC IEN Veteran and Family Member Programs)
0301	Medical Administration Specialist (Administrator On Duty (AOD))
0301	Veteran Outreach Program Specialist
0340	Program Management Officer (IVC IEN Customer Service and Veteran and Family Member Programs)

0340	Program Manager (IVC IEN Customer Service and Veteran and Family Member Programs)
0344	Program Assistant (IVC IEN Customer Service)
0382	Telephone Operating (Telephone Operators)
0503	Medical Reimbursement Technician (Office of Community Care)
0601	Acupuncturist
0601	Blind Rehabilitation Specialist
0601	Cytotechnologist
0601	General Health Science (Chiropractors, Expanded Function Dental Auxiliary)
0601	Health Science Specialist (Veterans Crisis Line)
0601	Histopathology Technologist
0601	Nuclear Medicine Technologist
0601	Supervisory Health Science Specialist (Veterans Crisis Line)
0601	Health Aid and Technician/Registered Respiratory Therapist
0602	Medical Officer (Physician)
0603	Physician Assistant
0610	Nurse (All Assignments)
0620	Practical Nurse
0620/0640	Telehealth Clinical Technician (TCT)ZHealth Technician (Telehealth Clinical)
0621	Nursing Assistant
0622	Medical Supply Technician (Sterile Processing)
0630	Dietitian
0631	Occupational Therapist
0633	Physical Therapist
0635	Corrective Therapist
0636	Rehabilitation Therapy Assistant/Physical Therapy Assistant and Rehabilitation Therapy Assistant/Occupational Therapy Assistant
0640	Health Aid and Technician
0640	Health Technician (Audiology), (Speech-Language Pathology), & (Audiology & Speech Language Pathology)
0640	Health Technician (Dietetics)
0640	Health Technician (Hearing Instrument Specialist)
0640	Health Technician (Massage Therapy)
0640	Health Technician (Ophthalmology)
0640	Health Technician (Optometry)
0640	Health Technician (Podiatrist)
0640	Health Technician (Telehealth Clinical)
0644	Clinical Laboratory Scientist
0645	Medical Technician (Medical Laboratory Technician)
0645	Medical Technician (Phlebotomy)
0646	Histopathology Technician

0646	Pathology Technician
0647	Diagnostic Radiologic Technologist
0648	Therapeutic Radiologic Technologist
0649	Medical Instrument Technician
0660	Pharmacist
0661	Pharmacy Technician
0662	Optometrist
0665	Audiologist
0665	Audiologist/Speech Language Pathologist
0665	Speech Language Pathologist
0665	Speech Pathology and Audiology
0667	Orthotist and Prosthetist
0668	Podiatrist
0669	Medical Records Administration
0671	Health System Specialist
0672	Prosthetic Representative
0673	Hospital Housekeeping Management
0675	Medical Records Technician
0679	Medical Support Assistance
0680	Dental Officer (Dentist)
0681	Dental Assistant
0682	Dental Hygienist
0683	Dental Laboratory Aid and Technician
0690	Industrial Hygiene (Industrial Hygienist)
0801	Healthcare Engineer
0803	Safety Engineer
0856	Electronics Technician
0858	Biomedical Engineer
0901	Legal Administrative Specialist (Member Services and IVC IEN Veteran and Family Member Programs)
0962	Contact Representative (IVC IEN Veteran and Family Member Programs)
0998	Claim Examiner
1306	Health Physics (Health Physicist and Radiation Safety Officer)
1601	Biomedical Equipment Support Specialist
1712	Training Specialist (IVC IEN Customer Service)
1715	Vocational Rehabilitation Specialist/Vocational Development Specialist
2151	Dispatching
2805	Electrician
3566	Custodial Worker (Housekeeping Aids)
4204	Pipefitting (Pipe Fitters)

4206	Plumbing
4701	Miscellaneous General Maintenance and Operations Work
4742	Utility Systems Repairer-Operator
4749	Maintenance Mechanic
4805	Medical Equipment Repairer
5026	Pest Controller
5306	Air Conditioning Equipment Mechanic
5309	Heating and Boiler Plant Equipment Mechanic
5313	Elevator Mechanic
5317	Laundry and Dry Cleaning Equipment Repairing
5352	Industrial Equipment Mechanic
5402	Boiler Plant Operating
5406	Utility Systems Operating
5408	Wastewater Treatment Plant Operating
5409	Water Treatment Plant Operating
5415	Air-Conditioning Equipment Operating
5703	Motor Vehicle Operator (Limited to patient transportation)
5716	Engineering Equipment Operating
6907	Materials Handler
7304	Laundry Worker
7404	Cook (Cook and Cook Supervisor)
7408	Food Service Worker (Food Service Worker and Food Service Worker Supervisor)
Any	Veterans Crisis Line
Any	Canteen- Veterans Canteen Service
	VETERANS BENEFITS ADMINISTRATION
0101	Rehabilitation Counselor
0828	Construction Analyst (Specialty Adapted Housing)
0901	General Legal and Kindred
0996	Veterans Claims Examiner
1171	Appraisers (Specialty Adapted Housing Agents)
1715	Vocational Rehabilitation Specialist
	BOARD OF VETERANS APPEALS
VLJ	Veterans Law Judges
0905	Decision-Drafting Attorneys and Supervisory Counsel
0905	General Attorneys
	NATIONAL CEMETERY ADMINISTRATION

0301	Program Specialist (Cemetery Manager)
0301	Program Specialist (Scheduling Office & MPS Only)
0303	Program Support Assistant (Scheduling Office & MPS Only)
0303	Program Support Assistant (Cemeteries Only)
0341	Administrative Officers (Cemeteries Only)
1630	Cemetery Administration Specialists
4701	Maintenance/Operations Supervisor
4749	Maintenance Worker/Mechanic
4754	Cemetery Caretaker
5003	Gardener
5703	Motor Vehicle Operator
5705	Tractor Operator
5716	Engineering Eqpt Operator
5803	Heavy Mobile Equip Repairer/Mechanic
5823	Automotive Worker/Mechanic

Exhibit C

⚡ 1 weather alerts

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LOCAL NEWS



As concerns among veterans rise, VA source shares details of workforce reduction plan

While the VA assures that veterans will not see any disruptions in care, organizations in Las Vegas are bracing for potential ripple effects.

Posted 7:40 PM, Apr 09, 2025 and last updated 11:26 AM, Apr 11, 2025



By: Alyssa Bethencourt



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Department of Veterans Affairs sign.

Editor's note: We continue to follow this story on Thursday after receiving an email from the Department of Veterans Affairs claiming the document cited in this reporting is "fraudulent."

It has been widely reported and verified that 80,000 jobs are being reduced from the VA workforce nationwide. Our reporting includes information from a source with direct knowledge of the department's plans that outlined how those decisions would be made and which jobs would be impacted.

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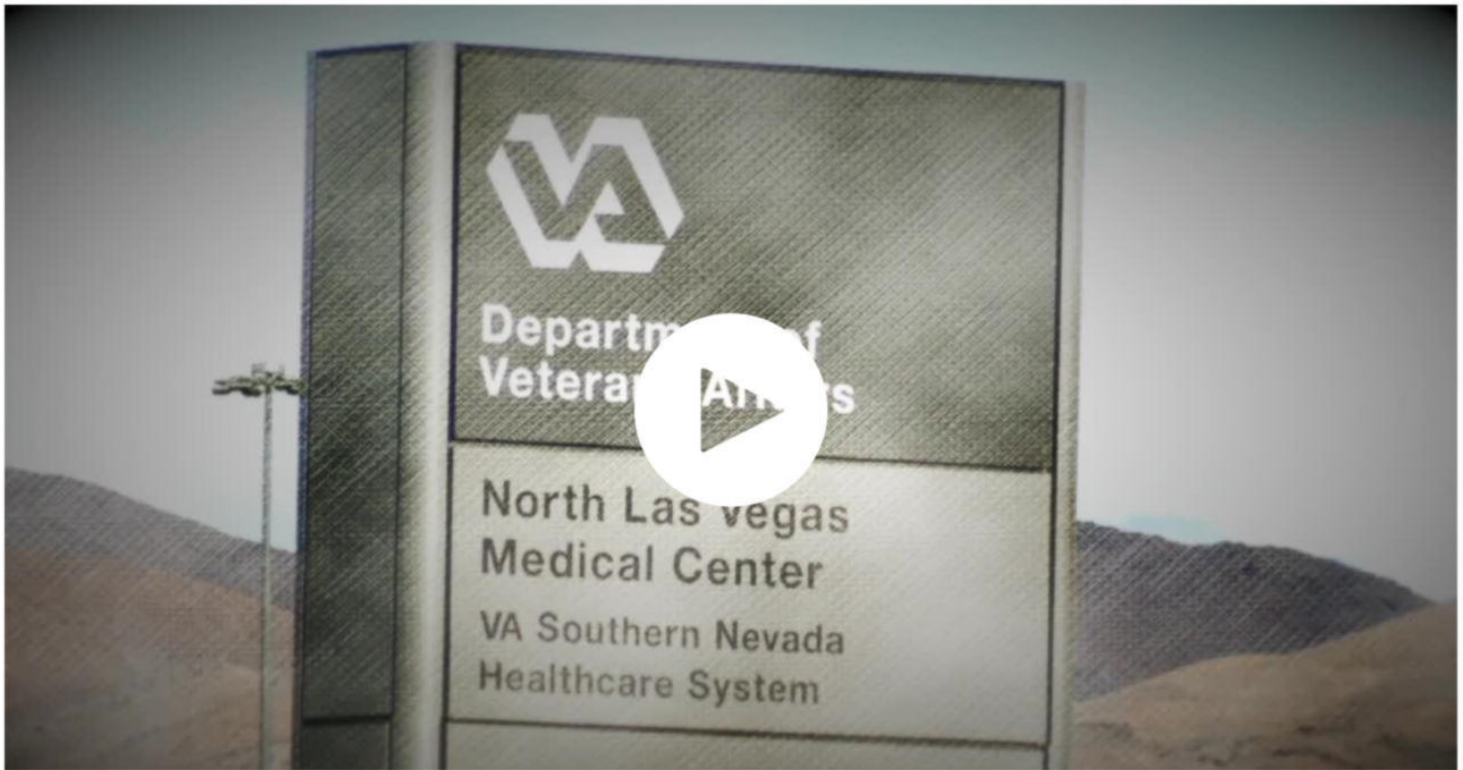
A department spokesperson reached out to Channel 13 in response to this reporting, writing in an email that the information we received came from a "fraudulent and intentionally false leaked document."

We followed up with the VA to ask what they mean by "fraudulent" and to ask that they provide further details and proof of that claim. VA press secretary Pete Kasperowicz responded with this statement:

This story is based on a fraudulent and intentionally false leaked document that does not reflect VA's reform plan, which is still being developed. It does not come from anyone involved in VA's plan. By describing this as part of "the department's plans," KTNV is spreading disinformation and creating unwarranted fears around our efforts to make VA work better for Veterans, families, caregivers and survivors.

LAS VEGAS (KTNV) — A shake-up is underway at the Department of Veterans Affairs (VA), with a nationwide workforce reduction plan set to [impact more than 80,000 employees](#). While the VA assures that veterans will not see any disruptions in care, local organizations in Las Vegas are bracing for the ripple effects of these job cuts.

VIDEO | How the workforce reduction plan could impact veterans in Nevada



Nationwide Workforce Reduction

According to information shared with Channel 13 on March 28, the VA's workforce reduction plan will unfold in three phases through the end of the year. Internal documents obtained by Channel 13 reveal the following timeline for the cuts:

1. Administrative and Support Roles:

- Policy and program analysts
- HR personnel
- IT support staff in non-critical functions
- Clerical and data entry positions

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2. Medical and Healthcare Support Staff:

- Non-patient-facing administrative healthcare roles
- Some contract positions in VA medical centers
- Certain research positions with reduced funding

3. Regional and Central Office Staff:

- Veterans Affairs Central Office (VACO) will see cuts in operational, administrative, and policy roles
- Reductions in public affairs, strategic planning, and some procurement functions

4. Field Office and Call Center Reductions:

- VA call centers are expected to be streamlined with automation, reducing the need for live agents
- Some regional field office roles will be merged or reassigned

Phase 1: Initial Announcements & Voluntary Exits (March - June 2025)

March 2025:

- Official announcement of the workforce reduction plan
- Internal communications sent to department heads outlining impact areas
- Voluntary Separation Incentives (VSIP) and Early Retirement (VERA) programs launched
- Hiring freeze implemented for affected roles

April - May 2025:

- Departments identify specific employees at risk and begin individual consultations
- Voluntary retirements and separations processed

- Workforce retraining programs introduced for employees willing to transition into alternative roles

June 2025:

- VA finalizes the list of employees subject to layoffs if voluntary separations are insufficient
- Notifications sent to impacted employees
- First reallocation of duties for remaining staff

Phase 2: First Wave of Layoffs & Adjustments (July - September 2025)

July 2025:

- First round of layoffs begins, mainly targeting administrative and non-essential roles
- VA implements staffing reassignments where feasible
- Employee transition programs start, helping affected workers seek other federal employment

August 2025:

- Impact assessment conducted to evaluate service disruptions
- VA adjusts remaining workforce allocation to prevent disruptions in veteran-facing services

September 2025:

- Second round of layoffs begins, primarily affecting regional and central office staff
- Automation systems deployed, reducing demand for certain clerical and customer service roles

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Phase 3: Final Adjustments & Transition (October - December 2025)

October - November 2025:

- VA monitors post-reduction service efficiency and adjusts workloads as necessary
- Final efforts to reallocate displaced employees to other government roles

December 2025:

- Completion of the RIF plan
- Final workforce adjustments and long-term strategy development for maintaining efficiency with fewer employees
- The plan covers a wide range of positions, from administration and IT to HR and call centers. While the VA insists that direct care roles will be spared, many worry that the ripple effects will still be felt on the ground, especially in local programs that serve veterans

Local Impact: What it means for veterans in Las Vegas

In Las Vegas, the local impact is already being felt. Programs that assist veterans, like [Forgotten Not Gone](#), are grappling with the uncertainty these cuts bring. The nonprofit organization, which has been offering free specially-designed trikes to local veterans for over a decade, is concerned that the reduction in VA staff could lead to funding shortfalls and more limited services.

"A lot of my veterans were really panicking, and we're feeling it now," said founder Kelley Guidry.

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The organization fills critical gaps, especially in areas where government support falls short. However, the organization has already faced financial struggles after their City

of North Las Vegas grant ended in September. Now, with funding cuts on the horizon, they're uncertain if their planned government grant from the VA will ever come through.

"I've just been paying \$10,000 a month, trying to garner community support, and trying not to interrupt my veterans," Guidry said, adding that her primary focus is preventing veterans from feeling the pressure, even though they already are.

VA's Statement on the Workforce Reduction

In response to concerns, the VA issued a statement to Channel 13, emphasizing that the agency is focused on "reducing bureaucracy" rather than cutting services for veterans.

VA will run through a deliberative process and find ways to improve care and benefits for Veterans without cutting care and benefits for Veterans.

We're not talking about reducing medical staff or claims processors, we're talking about reducing bureaucracy and inefficiencies that are getting in the way of customer convenience and service to veterans.

Meanwhile, all VA mission-critical positions are exempt from cuts, and hiring continues for [more than 300,000 essential positions](#).

When pressed about the potential for service delays, wait times, and local impact, the VA declined to offer further comments.

The Uncertainty Facing Providers

For providers like Forgotten Not Gone, the situation remains precarious. Guidry, who has been shouldering the organization's financial burden, fears that the cuts will only make things worse.

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"We don't have overhead, we don't have funding and it's only going to get worse," she said.

Exhibit D

Government Executive

VA forces staff in workforce reduction discussions to sign non-disclosure agreements

By Eric Katz

April 24, 2025

The Veterans Affairs Department is requiring all employees working on its plans to slash tens of thousands of workers from its rolls to sign non-disclosure agreements, an unusual move that has prevented supervisors from sharing basic information with staff.

VA has begun holding meetings with representatives from across the department to discuss its workforce reduction plans after standing up a Reorganization Implementation Cell. Senior Executive Service and General Schedule-14 and 15 employees serving in those roles have signed NDAs, according to five employees briefed on the situation. *Government Executive* [first reported](#) that VA plans to cut its workforce down to fiscal 2019 levels, leading to cuts of around 80,000 employees.

Senior leaders throughout VA appear to be taking their NDAs seriously. In a recent meeting, a recording of which was obtained by *Government Executive*, Colleen Richardson, executive director of VA's Caregiver Support Program, told employees she had answers to their questions but could not disclose them.

Richardson said, for example, she could not disclose how many employees had signed up for the department's "deferred resignation program" that has enabled some staff to remain on paid leave until they separate from the agency by Sept. 30. Employees were eager to know the information as more people signing up will result in fewer employees being laid off.

"I want to just let people know a majority of senior leaders have been asked to sign non-disclosure agreements, NDAs," Richardson said. "I have been asked to sign an NDA so we are very, very limited on what information we can also share."

NDAs for issues such as personnel matters are highly unusual in government, where such agreements are typically limited to procurement-sensitive discussions and national security settings that include classified information. One senior human resources official in another part of government called the agreements "strange, technically unnecessary and redundant."

Federal employees already agree to not disclose deliberative matters to the public as part of their jobs and therefore the substance of the NDA is already implied and expected, that person said. The official speculated VA was seeking to limit what employees can say about those discussions in the event that they are themselves part of a reduction in force, as the NDA would likely extend beyond their termination.

VA did not respond to a request for comment.

Rep. Mark Takano, D-Calif., the top Democrat on the House Veterans Affairs Committee, said the NDAs could illegally circumvent whistleblower protection laws and encouraged employees to come forward to help lawmakers shed a light on the process.

"The use of NDAs in this context looks like a deliberate effort by the Trump administration to silence VA employees and block oversight," Takano said. "Secretary [Doug] Collins has failed to answer basic questions from Congress, and now his department is doubling down on secrecy."

Members of both parties have expressed apprehension about VA's large-scale workforce reduction plans.

One VA employee who has discussed the NDA-subjected meetings with attendees said the senior leaders “don’t like” having to sign the agreements but “are being cautious not to create chaos.”

“These are all really good, talented and caring leadership being thrown in the middle of this scuffle and are doing their best to protect us and our programs,” the employee said. “I feel for them and know they are bruised and tired.”

Another VA employee said a senior executive told 200 staff in a town hall that they were restricted by the NDA. The leadership team of that office has “been as open with us” as they can, but have offered up few details of the workforce reduction discussions. A third VA staffer briefed on the meetings found some comfort in, unlike some other agencies, the department involving career staff in the workforce meetings.

VA will review the suggestions from individual components in May and release its reorganization plan in June. RIFs will take place by September.

The discussions to date have focused on which positions VA will shed, according to one official familiar with them, though they have not yet begun contemplating which actual individuals will lose their jobs. The meetings have also involved the impacts of the hiring freeze and requests for [additional exemptions](#). The leadership teams are reacting constantly to updates from the top levels of the department as “the rules of the game seem to be changing by the day,” the official said.

Another VA employee said the meetings have also honed in on reductions to the department’s call centers. VA currently has [many call centers](#), including one at each of its regional offices for scheduling appointments. The most recent plan, the employee said, is to cut that down to two call centers: one for scheduling appointments and another for matters such as billing, pharmacy and community care. VA’s 988 crisis line would also remain separate.

Richardson, the Caregiver Support Program executive, told employees she had to withhold details from them.

“There are certain things I cannot discuss even if I know them,” she said. “My sincere apologies, but that’s the truth behind it.”

By Eric Katz

April 24, 2025

<https://www.govexec.com/workforce/2025/04/va-forces-staff-workforce-reduction-discussions-sign-non-disclosure-agreements/404808/>